

# EXHIBIT A

**Gregory Rattray**  
**2/12/2025**

<p>1 UNITED STATES DISTRICT COURT 2 SOUTHERN DISTRICT OF NEW YORK 3 4 SECURITIES AND EXCHANGE ) 5 COMMISSION, ) 6 Plaintiff, ) 7 ) Civil Action No. 8 v. ) 23-cv-9518-PAE 9 ) 10 SOLARWINDS CORP. and ) 11 TIMOTHY G. BROWN, ) 12 ) 13 Defendants. ) 14 ) 15 VIDEO RECORDED EXAMINATION OF 16 GREGORY RATTRAY 17 WEDNESDAY, FEBRUARY 12, 2025 18 NEW YORK, NEW YORK 19 20 21 22 23 CERTIFIED STENOGRAPHER: 24 JESSIE WAACK, RDR, CRR, CCRR, NYRCR, NYACR, 25 CCR-NJ (No. 30XI008238700) CSR-TX (No. 11958) CCR-WA (No. 21007264), CSR-CA (No. 14420), REALTIME SYSTEMS ADMINISTRATOR JOB NO. 250212JWAA</p> <p style="text-align: center;">1</p>	<p>1 A P P E A R A N C E S 2 3 ON BEHALF OF THE PLAINTIFF: 4 SECURITIES AND EXCHANGE COMMISSION 5 BY: CHRISTOPHER CARNEY, ESQ. 6 BY: JOHN TODOR, ESQ. 7 BY: CHRISTOPHER BRUCKMANN, ESQ. 8 BY: KRISTEN WARDEN, ESQ. (Remote) 9 BY: LORY STONE, ESQ. (Remote) 10 100 F Street, N.E. 11 Washington, D.C. 20549 12 PHONE: 800-732-0330 13 EMAIL: Carneyc@sec.gov 14 15 ON BEHALF OF THE DEFENDANTS: 16 LATHAM &amp; WATKINS LLP 17 BY: SERRIN TURNER, ESQ. 18 BY: MATTHEW VALENTI, ESQ. (Remote) 19 1271 Avenue of the Americas 20 New York, New York 10020 21 PHONE: 212-906-1330 22 EMAIL: Serrin.turner@lw.com 23 24 25</p> <p style="text-align: center;">3</p>
<p>1 2 3 VIDEO RECORDED EXAMINATION of 4 GREGORY RATTRAY, taken before 5 JESSICA R. WAACK, Registered Professional 6 Reporter, Registered Merit Reporter, 7 Certified Realtime Reporter, Registered 8 Diplomat Reporter, California Certified 9 Realtime Reporter, New Jersey Certified Court 10 Reporter (License No. 30XI008238700); Texas 11 Certified Shorthand Reporter (License No. 12 11958); Washington State Certified Court 13 Reporter (License No. 21007264); California 14 Certified Shorthand Reporter (License No. 15 14420); New York Association Certified 16 Reporter, New York Realtime Court Reporter 17 and Notary Public of Washington, D.C. and the 18 States of New York, Pennsylvania, Delaware, 19 Maryland and Virginia, at Latham &amp; Watkins, 20 1271 Avenue of the Americas, New York, New 21 York, on Wednesday, February 12, 2025, 22 commencing at 9:41 a.m. and concluding at 23 6:46 p.m. 24 25</p> <p style="text-align: center;">2</p>	<p>1 A P P E A R A N C E S 2 3 ON BEHALF OF THE DEFENDANTS: 4 LATHAM &amp; WATKINS LLP 5 BY: SEAN M. BERKOWITZ, ESQ. 6 BY: MAURICE BAYNARD, ESQ. 7 330 North Wabash Avenue, Suite 2800 8 Chicago, Illinois 60611 9 PHONE: 312-777-7016 10 EMAIL: Sean.berkowitz@lw.com 11 12 A L S O P R E S E N T 13 (REMOTE) 14 ANNIE GRAVELLE 15 BECKY MELTON 16 17 A L S O P R E S E N T 18 19 DANNY ORTEGA, videographer 20 ERIC COLE 21 ROZALIA (ROZI) KEPES 22 23 --oOo-- 24 25</p> <p style="text-align: center;">4</p>

<p>1 really, you know, got to the point that: A, they 2 were using Agile, and, B, the security testing 3 process was part of how they did Agile. You know, 4 it was the best illustration of that. 5 Q. And if we turn to the third page of 6 this document -- 7 A. Uh-huh. 8 Q. -- ending in 276, do you see there's 9 a -- there's an agenda on there? 10 A. Are we talking about the contents 11 page? 12 Q. Yeah, the contents page. 13 A. Right. 14 Q. Exactly. 15 A. Yeah. 16 Q. With time allotments -- 17 A. Uh-huh. 18 Q. -- including for a break? 19 A. Right. 20 Q. Is it your understanding that this was 21 part of a presentation? 22 A. You know, I don't -- it does appear to 23 be part of a presentation -- or not part of a 24 presentation. It looks like a deck that is meant 25 to be presented --</p> <p style="text-align: center;">201</p>	<p>1 BY MR. CARNEY: 2 Q. Okay. In paragraph 94 on page 52, 3 you -- I'll let you get to that. 4 A. Okay. Yes. I'm going to read the 5 paragraph about the final security reviews. 6 (Pause for reading/reviewing.) 7 A. Okay. Yeah. 8 Q. Okay. In that paragraph 94, you 9 describe final security reviews or FSRs as "the 10 most significant artifacts I've reviewed from 11 SolarWinds's software development process." 12 So let me ask you: Why are these the 13 most significant artifacts? 14 A. Well, you know, again -- or this is in 15 the context of the more general discussion of, you 16 know, the software development lifecycle and the 17 security aspects of it. 18 So, you know, the most significant, 19 you know, related to the fact that, you know, 20 these were -- these final security reviews 21 demonstrated, you know, both, you know, deep 22 process related to, you know, how they approached, 23 you know, secure development. 24 As -- you know, as well as, you know, 25 lots of -- lots of the supporting evidence for</p> <p style="text-align: center;">203</p>
<p>1 Q. Okay. 2 A. -- you know, which is maybe a 3 different answer. 4 Q. And do you know who it was presented 5 to? 6 A. You know, this is, you know, pretty 7 clearly a deck that is meant to be presented to 8 technologists related to the development process. 9 Q. And so would you agree that in some 10 instances, it's appropriate to review slide decks 11 to gain an understanding of the cybersecurity 12 practices that a company is following? 13 MR. TURNER: Objection to form. 14 THE WITNESS: You know, there -- you 15 know, this slide deck, you know, was used to 16 evidence that SolarWinds had, you know, moved to 17 the Agile process and that security was present. 18 It was, you know, it was part of the 19 full set of evidence along with Mr. Colquitt's 20 depositions and other technology leaders about how 21 they implemented the Agile process and the 22 security processes associated with it. 23 You know, it's an element of the 24 evidence I examined. 25 ///</p> <p style="text-align: center;">202</p>	<p>1 other elements of the -- you know, the 2 implementation of evidence in addition to the 3 other sources of evidence that exist for the 4 implementation of things like testing processes. 5 Q. Okay. In paragraph 95, you talked 6 about -- that you reviewed a sample from 7 approximately 100 FSRs you received. 8 Do you see that? 9 A. That's right. 10 Q. And who selected the samples that you 11 looked at? 12 A. You know, it was similar to the 13 other -- I call these evidence tranches. I may 14 have said that before. I think we were talking 15 about the SARFs, but maybe others as well. 16 I requested, you know, evidence from 17 the Latham team of, you know, implementation -- 18 you know, implementation including things like, 19 you know, the outputs of implementation processes 20 like final security reviews. 21 So they selected -- they selected the 22 hundred. 23 Q. And then you selected the -- I'm going 24 to -- I think I counted 14-or-so samples that are 25 identified in Footnote 120?</p> <p style="text-align: center;">204</p>

<p>1       <b>A.</b> Right. Similar process. I looked --</p> <p>2 in this case, I know I looked at more than 50,</p> <p>3 but, again, that 50 to 70 in this case as well.</p> <p>4       And then I selected the subset that</p> <p>5 I've cited in the report.</p> <p>6       (Whereupon, Exhibit 12 is marked for</p> <p>7 identification.)</p> <p>8 BY MR. CARNEY:</p> <p>9       <b>Q.</b> Okay. Dr. Rattray, I've handed you</p> <p>10 what's been marked as Exhibit 12. And, for the</p> <p>11 record, this is just the first sample that you</p> <p>12 identify in Footnote 120 of the FSR, and it starts</p> <p>13 with the Bates stamp SW-SEC-SDNY_00055119.</p> <p>14       And could you just help me, just walk</p> <p>15 me through this FSR, tell me what it shows.</p> <p>16       <b>A.</b> I'm gonna just read it through myself</p> <p>17 real quick --</p> <p>18       <b>Q.</b> Sure.</p> <p>19       <b>A.</b> -- and then, you know, I'll walk you</p> <p>20 through it.</p> <p>21       <b>Q.</b> Thank you.</p> <p>22       (Pause for reading/reviewing.)</p> <p>23       <b>A.</b> I looked through it.</p> <p>24       How should we proceed? Do you want to</p> <p>25 ask the question again and, you know, give me some</p> <p style="text-align: center;">205</p>	<p>1 development process from a security perspective,</p> <p>2 you know, so that the teams that are, you know,</p> <p>3 working on a given product or application, you</p> <p>4 know, are guided -- you know, guided in this</p> <p>5 fashion.</p> <p>6       So, again, it has requirements</p> <p>7 analysis. Again, as we talked about things like</p> <p>8 threat -- threat modeling, you know, understanding</p> <p>9 security requirements are part of the element of</p> <p>10 things like threat modeling.</p> <p>11       It talks to the type of testing</p> <p>12 outlined in the security statement. It even</p> <p>13 requires scheduling of testing early. Shows</p> <p>14 test -- testing results of a variety of sorts, you</p> <p>15 know, all the phases outlined in the security</p> <p>16 statement, you know, mapped here including to the</p> <p>17 sort of product security review.</p> <p>18       You know, this is the -- this is a --</p> <p>19 a process that constitutes product security</p> <p>20 review, you know, shows -- shows that the</p> <p>21 appropriate players were involved in the -- you</p> <p>22 know, the review -- an approval phase, phase 4.</p> <p>23       <b>Q.</b> So you mentioned that it shows testing</p> <p>24 results of a variety of sorts.</p> <p>25       Is it -- does this Exhibit 12 do that?</p> <p style="text-align: center;">207</p>
<p>1 parameters for the walkthrough?</p> <p>2       <b>Q.</b> Yeah. How about I'll just ask you, to</p> <p>3 speed things up.</p> <p>4       Can you just tell me how documents</p> <p>5 like this FSR establish to you that, if it does</p> <p>6 establish that to you, that SolarWinds followed</p> <p>7 all aspects of the SDL in its securities</p> <p>8 statement?</p> <p>9       <b>A.</b> Again, the FSRs were an element of the</p> <p>10 determinations I made around, you know,</p> <p>11 SolarWinds's, you know, software development and,</p> <p>12 you know, the statements made in the securities</p> <p>13 statement.</p> <p>14       You know, the presence of this review</p> <p>15 as process and the type of, you know,</p> <p>16 implementation that we see in these reviews, you</p> <p>17 know, is a pretty strong, you know -- you know,</p> <p>18 not pretty.</p> <p>19       It's a very strong, you know, capstone</p> <p>20 on a -- on a set of the processes outlined in the</p> <p>21 securities statement.</p> <p>22       You know, it includes things like</p> <p>23 requirements analysis, back to our -- you know,</p> <p>24 its phase, there's a template, there's a series of</p> <p>25 things with structure that guide the -- the</p> <p style="text-align: center;">206</p>	<p>1 Does it show test results?</p> <p>2       <b>A.</b> I see checkmarks reports specifically</p> <p>3 as test results.</p> <p>4       <b>Q.</b> What page are you on?</p> <p>5       <b>A.</b> I'm on the second page.</p> <p>6       MR. TURNER: For the record, it's on</p> <p>7 all four pages.</p> <p>8       THE WITNESS: Oh, yeah. Fair enough.</p> <p>9 Second page, third page --</p> <p>10       MR. TURNER: From the first as well.</p> <p>11       THE WITNESS: -- and the last page.</p> <p>12 Yeah, yeah, bottom of the first page.</p> <p>13 BY MR. CARNEY:</p> <p>14       <b>Q.</b> And there are -- so are you saying</p> <p>15 that there are test results in this document, or</p> <p>16 that it links to other documents that purport to</p> <p>17 contain test results?</p> <p>18       <b>A.</b> No. There's test results in this</p> <p>19 document. The checkmark report and the data</p> <p>20 there, you know, high, medium, low, you know, as</p> <p>21 stated in basically all pages are test results.</p> <p>22       <b>Q.</b> So just for the record, the results</p> <p>23 themselves are in this document?</p> <p>24       MR. TURNER: Just object to form.</p> <p>25       Go ahead.</p> <p style="text-align: center;">208</p>